

Terry S. Maley
tsmaley@msn.com
208-344-6038
Boise, Idaho
and
William R. Wilson
wrwilson@mines.edu
303-905-7774

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Larry Sandoval
Field Manager,
Colorado River Valley Office of the BLM

and

BLM Mineral Examiner assigned to RMR's Limestone Quarry Project,
Glenwood Springs, Colorado

This letter and accompany report were prepared by:

Mr. Wilson is a Consulting Metallurgical Engineer (Met.E.), MBA, a Mining and Metallurgical Society of America Qualified Professional in Mining, Metallurgy & Processing and Environmental Compliance and a Professor of Practice in the Mining Engineering Department at the Colorado School of Mines.

Terry Maley, Ph.D., P.G., is a retired BLM mineral examiner (CME-002 and CRME-002). He is the author 6 editions of *Mineral Law*; for more than 40 years these books have been cited as an authority in Department of the Interior manuals, handbooks, published Solicitor's Opinions, IBLA decisions and State and Federal Court decisions.

As a follow up to the recent letter to you dated March 26, 2019, regarding Rocky Mountain Resources' (RMR) proposed plan of operations dated November 21, 2018, and modification dated March 8, 2019, we hereby submit a report captioned *Validity of Rocky Mountain Resources' Limestone Claims, Glenwood Springs, Colorado*. In addition to the serious lack of exploration drilling and representative sampling, this report covers a number of similar claim validity issues that show that most, if not all, of RMR limestone claims may not be supported by a discovery.

We urge you to see that this report is given to the mineral examiner as soon as convenient. Should the BLM require additional information or questions answered, we are available for a conference call.

This report is based on RMR's plan expand quarry production to 5 million tons per year of combined chemical and dolomitic limestone with at least 20 years of quarrying operations to mine a minimum of 100 million tons. This huge planned production would swamp the existing regional market for aggregate (see marketing discussion below).

Limestone may be locatable in one of two ways depending on the product: (1) limestone of chemical or metallurgical grade, or that is used for making cement, and is 95 percent or more total carbonates may be locatable if the product requires 95 percent or more total carbonates and can meet the marketability test of *Coleman*; or (2) aggregate and dimension stone must satisfy both the *McClarty* and the marketability tests for locatable limestone. Considering RMR's intention to mine 5 million tons of limestone per year, it appears very likely that the company plans to produce significant quantities of aggregate and possibly cement. Most of the other product uses on its list have a relatively small potential market. It is highly unlikely that any aggregate from RMR's claims could qualify as a locatable mineral under the *McClarty* tests or any other standards.

In an extraordinary departure from conventional practice, RMR filed a proposed Plan of Operation before it has characterized the grade and reserves of the limestone. From all reports, there has been no exploration drilling on most of the land outside the existing Mid-Continent quarry. How can RMR estimate reserves or resources, propose products to be mined, design quarry operations, design a processing plant, anticipate and mitigate environmental problems and design a reclamation plan when it has little or no knowledge of the limestone deposit it intends to mine? This is why RMR's plan is generic in every respect and the plan will require constant revision as the company explores and discovers the character of the subsurface.

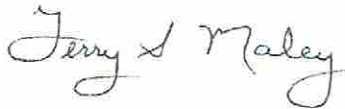
In the Plan of Operations Modification, RMR specified 15 limestone products that it intends to produce from the Mid-Continent Quarry. With RMR planning an annual production of 5 million tons, the obvious questions are (1) what products does RMR intend to market, (2) how much of each product is to be produced, and (3) can each product be marketed at a present profit. Each product must be critically evaluated on its own unique circumstances (the use, specifications required for that use, the law, and the market and proposed transportation mode to customers); the validation of one product would not validate any others, regardless of the purity of the limestone.

Bill Wilson examined the regional limestone market for cement and aggregates. Of the 15 limestone products on its list, aggregates are the only large potential market likely to be pursued by RMR.

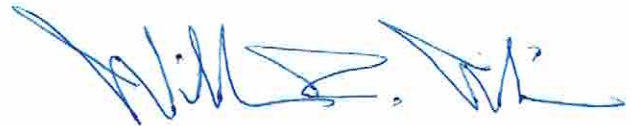
There is minimal or no information in the Plan of Operation as a comprehensive market and transportation plan. Products and targeted markets are generalized with no confirmation that the quarry rock has sufficient limestone suitable for cement production. RMR would face intense competition in the Front Range and Western Slope in the aggregate market. Cement plants require strict chemical and size specifications, difficult if not impossible for RMR to provide based on current resource data and confirmation by

a comprehensive drilling program. The added transportation costs by rail to those plants would add in excess of \$9 per ton when compared to the local Colorado Front Range onsite cement limestone resources. RMR has provided no details on rail loadout and rail car storage in the Glenwood Springs area. These uncertainties unless mitigated by a drill program and a detailed examination of transportation options preclude any reasonable expectation that RMR can compete in the cement industry. Further, these same uncertainties seriously limit RMR from competing in the Front Range aggregate markets.

Sincerely,

A handwritten signature in blue ink that reads "Terry S. Maley". The script is cursive and fluid.

Terry S. Maley

A handwritten signature in blue ink that reads "William R. Wilson". The script is cursive and fluid.

William R. Wilson